

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310

**DECLARATION OF JAMES D. SHEAD IN SUPPORT OF COMMSCOPE'S
OPPOSITION TO TQ DELTA, LLC'S SECOND MOTION TO COMPEL**

I, James D. Shead, declare and state as follows:

1. I am Managing Corporate Counsel – Litigation at CommScope Technologies, LLC.

I have knowledge of the facts set forth herein, and if called to do so, could competently testify to them. I submit this declaration in support of CommScope's opposition to TQ Delta's second motion to compel.

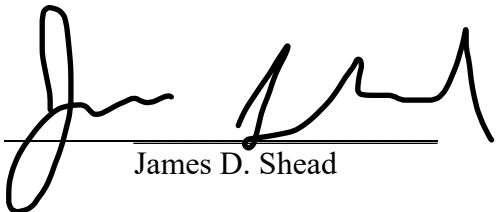
2. I am personally familiar with the main central document repositories that are used in the normal course of CommScope's business. In particular, the systems that CommScope uses for central document repositories are Agile, DigitalCM, SharePoint, and OneDrive.

3. In connection with this case, I personally performed searches in Agile, DigitalCM, SharePoint, and OneDrive for documents relating to the accused DSL products that CommScope has sold in the United States since 2015. For each product that I searched for, I collected all of the

documents located in the central repositories and provided them for production to TQ Delta. I did not remove or withhold any documents that hit on my searches for the accused products.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: August 12, 2022

By: 
James D. Shead